

**FILED**

**OCT 23 2019**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEONARD JOHNSON,  
a/k/a Leonard C. Johnson, III

Defendant.

)  
)  
)  
)  
) CRIMINAL NUMBER:

19-30139-NJR

) Title 18,  
) United States Code,  
) Sections 1001, 666, and 2  
)

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**INTRODUCTION**

1. At all relevant times, there was a federal Southern Illinois Public Corruption Task Force consisting of agents with the Federal Bureau of Investigation, Internal Revenue Service/Criminal Investigations and a federal task force officer with the Illinois State Police.

2. The federal Southern Illinois Public Corruption Task Force had a federal criminal investigation into embezzlement by the Executive Director of the Lessie Bates Davis Neighborhood House and whether kickbacks or illegal gratuities were received by the Executive Director in exchange for contracts or payments from Lessie Bates Davis Neighborhood House to third parties.

3. JCS Consulting Services was a Missouri limited liability company owned by **LEONARD JOHNSON**. Between the summer of 2016 and the summer of 2017, Lessie Bates Davis Neighborhood House, at the direction of Christopher K. Coleman, paid JCS Consulting Services c/o Leonard Johnson \$23,998 for which no services or product was received. Out of the funds received, **LEONARD JOHNSON** made cash payments back to Christopher K. Coleman.

**COUNT 1**

**FALSE STATEMENT TO THE FEDERAL SOUTHERN ILLINOIS PUBLIC CORRUPTION TASK FORCE**

1. The paragraphs of the Introduction are incorporated herein.
2. At all times relevant to the Indictment including in March of 2019, the federal Metro-East Public Corruption Task Force was investigating possible illegal kickbacks, bribes or gratuities for monies received by Christopher K. Coleman while Executive Director of the Lessie Bates Davis Neighborhood House.
3. On or about February 22, 2019, in St. Clair County within the Southern District of Illinois, and elsewhere,

**LEONARD JOHNSON,**

defendant, did willfully and knowingly make, and cause to be made, materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of a department or agency of the United States, attempting to obstruct the due administration of justice in the investigation, by telling a Federal Bureau of Investigation Special Agent and an Internal Revenue Service/Criminal Investigations Special Agent that Coleman would not get anything back from a contract Coleman gave to Johnson. The statement was materially false in that **LEONARD JOHNSON** knew that he had made cash payments to Christopher K. Coleman from the money that was received from the Lessie Bates Davis Neighborhood House.

All in violation of Title 18, United States Code, Section 1001(2).

**COUNT 2**

**AIDING AND ABETTING EMBEZZLEMENT FROM THE LESSIE BATES NEIGHBORHOOD HOUSE,  
AN ORGANIZATION THAT RECEIVED FEDERAL FUNDS**

1. The Lessie Bates Davis Neighborhood House, originally established in 1909, is a non-profit, faith based organization in East St. Louis, Illinois, whose mission is to improve the quality of life for residents of all ages by providing quality early childhood development services, comprehensive youth services, individual and family support services, services to older adults, and housing economic development services which will help move individuals and families out of poverty.

2. In July of 2016, Christopher K. Coleman became the Executive Director of the Lessie Bates Neighborhood House. As Executive Director he was in charge of overseeing the operation including its fiscal affairs.

3. From July of 2016 through December of 2017, Christopher K. Coleman embezzled funds from the Lessie Bates Neighborhood House for the benefit of himself and others.

4. From in or about July of 2016 through in or about June of 2017, [ a one-year period for jurisdictional purposes] in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

**LEONARD JOHNSON,**

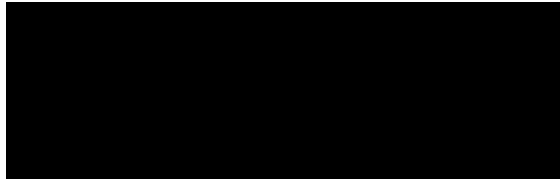
defendant herein, aided and abetted Christopher K. Coleman, the Executive Director of Lessie Bates Davis Neighborhood House, an agent of an organization that received federal funds in excess of \$10,000 in embezzling property worth at least \$5,000 under the control of the Lessie Bates Davis Neighborhood House, Inc.

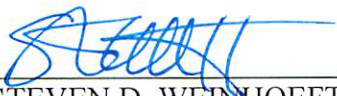
5. Between the summer of 2016 and the summer of 2017, Lessie Bates Davis Neighborhood House, at the direction of Christopher K. Coleman, paid JCS Consulting Services


c/o Leonard Johnson \$23,998 for which no services or product was received. Out of the funds received, **LEONARD JOHNSON** made cash payments back to Christopher K. Coleman.

All in violation of Title 18, United States Code, Section 666(a)(1)(A) and Title 18, United States Code, Section 2.

**A TRUE BILL**



  
STEVEN D. WEINHOFET  
United States Attorney  
Southern District of Illinois

  
NORMAN R. SMITH  
Assistant United States Attorney

Recommended bond: \$20,000 unsecured.